UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

D.V.D., et al.,	
Individually and on behalf of all others similarly situated,	
Plaintiffs,	No. 1:25-cv-10676-BEM
v.)	
U.S. Department of Homeland Security, et al.,)	
Defendants.	
)	

JOINT MOTION TO ENLARGE PAGE LIMITS REGARDING PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT AND DEFENDANTS' MOTION TO DISMISS

The parties respectfully move for an enlargement of their page limits for the parties' forthcoming briefing on Plaintiffs' motion for partial summary judgment (ECF No. 193) and Defendants' motion to dismiss. The issues raised in these motions are numerous, complex, and substantially overlap. Therefore, to avoid unnecessary repetition and for the purpose of judicial economy, Defendants intend to submit a combined motion to dismiss and opposition to Plaintiffs' motion for partial summary judgment. Accordingly, Defendants respectfully request an enlargement of their page limit for this combined motion and opposition of up to forty (40) pages. See L.R. 7.1(b) (allowing twenty pages for motion memoranda).

Should Defendants' motion be granted, Plaintiffs request a commensurate thirty (30) pages for their combined opposition to Defendants' motion to dismiss and reply in support of their motion for partial summary judgment.

Respectfully submitted,

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/s/Mary L. Larakers

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CERTIFICATE OF SERVICE

I, Mary Larakers, Senior Litigation Counsel, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Mary L. Larakers
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Senior Litigation Counsel

Dated: November 24, 2025